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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

F I L E D
DEC 06 2022
CLERK'S OFFICE
DETROIT

United States of America,

Case No.: 22-cr-20565

Plaintiff,

Hon. Bernard A. Friedman

v.

Violation:

D-1 Joshua Johnson,

18 U.S.C. § 2118(a)

D-2 Zamonta Martin-Jackson,

Defendants.

_____ /

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**18 U.S.C. § 2118(a) - Robbery Involving Controlled Substances;
18 U.S.C. § 2 – Aiding and Abetting**

D-1 Joshua Johnson

D-2 Zamonta Martin-Jackson

On or about September 10, 2022, in the Eastern District of Michigan,
defendants, Joshua Johnson and Zamonta Martin-Jackson, aided and abetted by
each other, knowingly and unlawfully took from the person and presence of

another by force, violence, and intimidation, a material or compound containing a quantity of controlled substance, to wit: Oxycodone and Percocet pills; belonging to and in the care, custody, control, and possession of Merriman Drugs Pharmacy, a pharmacy that was then registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act. The replacement cost of the controlled substances taken by Joshua Johnson and Zamonta Martin-Jackson was more than \$500.

All in violation of Title 18, United States Code, Sections 2118(a) and 2.

FORFEITURE ALLEGATION

Pursuant to Federal Rule of Criminal Procedure 32.2(a), the government hereby provides notice to the defendants of its intention to seek forfeiture of all proceeds, direct or indirect, obtained as a result of the violations set forth in this Indictment, all property traceable thereto, all property that facilitated the commission of such violations, or property traceable thereto, and all property involved in such violations, or property traceable thereto.

Forfeiture includes, but is not limited to, the forfeiture of defendants' interest to the United States in all property involved in Count One as property used, or intended to be used, in any manner or part to facilitate the commission of Count

One of the Indictment. The property is subject to forfeiture pursuant to 28 U.S.C.
§ 2461(c).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Craig F. Wininger

CRAIG F. WININGER
Chief, Violent & Organized Crime Unit

s/ Terrence R. Haugabook

TERRENCE R. HAUGABOOK
Assistant United States Attorney

Dated: December 6, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 22-cr-20565
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: TH

Case Title: USA v. Joshua Johnson et al

County where offense occurred: Wayne

Offense Type: Felony

Indictment --- based upon LCrR 57.10 (d) [Complete Superseding section below]

Superseding Case Information

Superseding to Case No: 22-cr-20565 **Judge:** Bernard A. Friedman

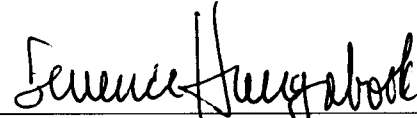
Reason:

Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant Name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
D-1 Joshua Johnson	18 U.S.C. § 2118(a)	
D-2 Zamonta Martin-Jackson	18 U.S.C. § 2	22-mj-30504

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

December 6, 2022
Date


Terrence R. Haugabook
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Bar #: P44554

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.